

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEBRASKA**

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IN THE MATTER OF:

CASE NO. 13-40411

GREAT PLATTE RIVER ROAD MEMORIAL  
FOUNDATION,

CHAPTER 11

Debtor.

**DEBTOR'S MOTION TO CONTINUE  
HEARING**

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COMES NOW the Great Platte River Road Memorial Foundation, Debtor and Debtor-in-Possession ("Debtor") and moves this Court for an Order continuing the hearing set on Debtor's Motion to Incur Unsecured Debt [Filing No. 6] (the "Motion to Incur"). In support of this Motion, Debtor states as follows:

1. Debtor commenced this Chapter 11 Case by filing its Voluntary Petition on March 6, 2013. Debtor continues in possession of its property and continues to operate and manage its business as Debtor-in-Possession pursuant to 28 U.S.C. §§ 1107(a) and 1108.

2. The Motion to Incur depends on Debtor obtaining a commitment from a lender allowing Debtor to borrow funds. Debtor has not yet received such a commitment, but expects that it will obtain a commitment shortly.

3. Since Debtor has not yet secured such a commitment, the hearing on the Motion to Incur which is set for March 12, 2013 at 2:30 p.m. [Filing No. 17] is premature.

4. The hearing set for March 12, 2013 [Filing No. 18] on Debtor's Motion for Entry of Order Authorizing Debtor to Honor Obligations to Employees [Filing No. 9] is still necessary.

WHEREFORE Debtor requests that the hearing on the Motion to Incur be continued for at least five (5) business days (March 18, 2013) in order to allow Debtor to obtain a loan commitment.

Dated this 12<sup>th</sup> day of March, 2013

GREAT PLATTE RIVER ROAD MEMORIAL  
FOUNDATION, Debtor,

By: s/T. Randall Wright

T. Randall Wright (NE# 16398)

Eric J. Adams (NE# 24545)

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 12th day of March 2013, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which sent notification of such filing to the following:

T. Randall Wright  
rwright@bairdholm.com

United States Trustee  
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Jerry L. Jensen  
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s/T. Randall Wright

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